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March 12, 2002

The Honorable Leonard J. Koczur
Acting Inspector General
The Legal Services Corporation
750 First Street, NE 11th Floor
Washington, D.C. 20002-4250
By Facsimile (202) 336-8955 And Regular Mail

Dear Mr. Koczur:

I write to comment on the draft report on the results of results of the audit of Central Virginia Legal Aid Society (CVLAS) by the Office of Inspector General, as follows:.

Recommendations:

The draft report recommended that the management of CVLAS adopt procedures to ensure that non-LSC funds:

- 1. finance intake services; and
- 2. finance membership fees paid to private and non-profit organizations.

CVLAS management will take action to implement these recommendations.

I would like to take this opportunity to add the following:

This on-site audit review by the office of Inspector General may have been somewhat unusual in that the on-site visit by the OIG's office presented CVLAS will an opportunity to seek some advance guidance from the office of the OIG as to matters under deliberation that had not been implemented. While the OIG's office was very clear that the office of general counsel of the Legal Services Corporation and not the OIG office has the authority to give binding advance guidance, the OIG's office did make some comments during the on-site visit in regard to matters under consideration. Those comment were very helpful to CVLAS.

On behalf of CVLAS, I wish to express admiration for the professionalism and objectivity of the OIG team, which conducted the on-site review at CVLAS. While maintaining





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proper distance and the OIG's oversight role, the OIG team set an example of courtesy and fairness that could serve as a model for any team charged with oversight responsibility.

As to the issue of intake. Because CVLAS is in accord with the recommendation of the OIG draft report, the issue of what would be the effect of a different response is mooted. I request that CVLAS's response not be construed as a precedent as regards other programs outside the service area of CVLAS where other programs might take a different position regarding issues raised by the OIG draft report.

Thank you for this opportunity to comment.

Sincerely,

Henry W. McLaughlin

Executive Director